

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

VIACOM INTERNATIONAL INC.,

Plaintiff,

- v. -

ZEUS NETWORKS, LLC; AND DOES 1 TO 10, INCLUSIVE.,

Defendants.

Case No. 1:25-cv-00973

**NOTICE OF DEFENDANT'S MOTION TO DISMISS THE COMPLAINT**

**PLEASE TAKE NOTICE** that upon the instant Notice of Motion, together with the accompanying March 31, 2025 Memorandum of Law, Defendant ZEUS NETWORKS, LLC (“Zeus”) hereby moves before the Honorable Arun Subramanian, of the United States District Court for the Southern District of New York, located at 500 Pearl Street, New York, New York, 10007, at a day and time to be determined by the Court, for an Order: (a) pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure and the applicable statute of limitations dismissing Plaintiff’s Complaint and all claims against Zeus with prejudice for failure to state a claim for which relief can be granted, and (b) granting any such further relief this Court may deem just and proper.

DATED: March 31, 2025

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By: /s/ Brian Pete

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Counsel for Defendant Zeus Networks,  
LLC

**CERTIFICATE OF SERVICE**

I hereby certify that on this 31st day of March, 2025, I electronically filed the foregoing **Notice of Defendant's Motion to Dismiss Plaintiff's Complaint** with the Clerk of the Court using the CM/ECF system.

/s/ Brian Pete  
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Brian Pete  
Counsel for Defendant Zeus Networks, LLC